

## Consultation Response Form

Your name:	Roger Pratley
Organisation (if applicable):	Morgannwg Local Dental Committee
Email:	roger@rdsp.fsnet.co.uk
Telephone number:	01792 771089 07715593961
Your address:	8 Pentrepoeth Road, Morriston, Swansea SA6 6AB

### Consultation Questions

<b>Question 1. Practice Registration</b>			
Do you agree with the change from registration of individual dentists to registration of dental practices which provide any private dentistry?			
Yes		No	<b>X</b>
<p>Comments:</p> <p>There is an issue here relating to cost. All current practices that provide NHS treatment are subject to inspections by HIW, on behalf of the appropriate Health Board. When inspections were carried out by the old DRS practitioners, quite rightly bore none of the costs but we believe that Practice Registration transfers these costs to the practices and in a disproportionate amount to the amount of private treatment carried out by a particular practice. We agree with practice registration under certain circumstances. We will comment further on this in our response to Question 6.</p>			

<b>Question 2. Direct access to Dental Care Professionals</b>			
Do you agree that DCPs who provide private direct access dental care in their own premises must register as a private direct access practice with HIW?			
Yes	<b>X</b>	No	
<p>Comments:</p> <p>This is necessary for DCPs in Wales to follow the direct access rules of the GDC</p>			

<b>Question 3. Quality and Safety</b>			
Do you agree with the suggested quality and safety issues covered in the draft regulations?			
Yes	<b>X</b>	No	
<p>Do you have any suggestions for additional quality and safety issues which should be included in the 2016 Regulations?</p> <p>No so long as the issues are the same as for NHS practices, which they appear to be.</p>			

**Question 4. Disclosure and Barring Checks**

Do you agree with the change to DBS requirements so that dentists, the practice staff and DCPs who provide direct access services from their own premises must have an enhanced DBS check when the practice registers with HIW?

Yes	<b>X</b>	No	
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Comments:

**Question 5. Use of Lasers**

Do you agree with the proposal to change the requirements to register use of lasers?

Yes	<b>X</b>	No	
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Comments:

**Question 6. Fees**

Do you agree with the reasons for increasing the fee to register with HIW?

Yes		No	<b>X</b>
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Do you agree with the proposed fee?

Yes		No	<b>X</b>
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Comments: Most NHS practices show a small commitment to private dentistry, and are also variable in their size e.g. a 2 dentist practice will pay the same as a 10 dentist practice, and the fees do not take into consideration the percentage split between NHS and private dentistry. The examples used to justify the increase, fees for private medical practices and CQC dental fees in England, are irrelevant and the new fees don't appear to be evidence based. NHS practices are already inspected by HIW and we fail to see the increased need for fees bearing in mind that all mixed practices are currently inspected anyway.

A proportionate registration fee we feel would be appropriate, depending on the NHS/private split of the practice. All the regulatory processes in the new regulations can be achieved in these circumstances.

We feel that the costings in these regulations are designed to transfer the cost of HIW in relation to dentistry on to the dental practices. We believe this to be inappropriate.

**Question 7. Regulatory Impact Assessment (RIA)**

Do you agree with the estimated costs/benefits regarding the implementation of the 2016 Regulations?

Yes		No	<b>X</b>
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Comments:  
As mentioned before the arguments used in 5.2 under Costs are irrelevant. We also disagree with the arguments used in section 5.4

<b>Question 8. RIA – expected costs</b>			
Do you have any comments on the expected costs to dental practices/businesses?			
Yes	<b>X</b>	No	
Comments: To reiterate previous comments, we believe that the costs to practices for the most part will be increased, despite there being no added value to the practices. There will be increased administration costs to practices in that they will have to recover proportionately the registration costs from individual registrants and for no extra funding. Also dentists working in more than one practice will be disproportionately penalised as will practices that practice from more than one address. We fail to see that there is any patient gain in this regulation change. We recommend that fees should be proportionate to the amount of non NHS dentistry undertaken.			

<b>Question 9. Other comments</b>	
We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please comment below.	
Comments: We agree that Private Dental Practice should be brought in line with NHS Dental Practices.	

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: